

Pro Se 7 2016

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

Nakeshia Terrell

CASE NO. 2:21-cv-00353 RAJ  
[to be filled in by Clerk's Office]

COMPLAINT FOR EMPLOYMENT  
DISCRIMINATION

Plaintiff(s),

Jury Trial: ☒ Yes ☐ No

v.

TravelCenters Of America

Defendant(s).

**I. THE PARTIES TO THIS COMPLAINT**

A. Plaintiff(s)

*Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.*

Name	Nakeshia Terrell
Street Address	PO BOX 1922
City and County	North Bend
State and Zip Code	WA 98045
Telephone Number	

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## 1 B. Defendant(s)

2 Provide the information below for each defendant named in the complaint, whether the  
 3 defendant is an individual, a government agency, an organization, or a corporation. For an  
 4 individual defendant, include the person's job or title (if known). Attach additional pages if  
 5 needed.

## 6 Defendant No. 1

7 Name TravelCenters of America

8 Job or Title (if known)

9 Street Address 46600 S E Northbend Way

10 City and County North Bend

11 State and Zip Code WA 98045

12 Telephone Number

## 13 Defendant No. 2

14 Name Mary J. Harris

15 Job or Title (if known) VP/Asst Gen Counsel

16 Street Address TA Operating LLC 255 Washington Street

17 City and County Newton

18 State and Zip Code MA 02458

19 Telephone Number

## 20 Defendant No. 3

21 Name

22 Job or Title (if known)

23 Street Address

24 City and County

State and Zip Code

Telephone Number

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Defendant No. 4

Name

Job or Title (if known)

Street Address

City and County

State and Zip Code

Telephone Number

## C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name

TravelCenters of America

Street Address

46600 S E NorthBend Way

City and County

North Bend

State and Zip Code

WA 98045

Telephone Number

425-888-1119

## II. BASIS FOR JURISDICTION

This action is brought for discrimination in employment pursuant to (check all that apply):



Title VII of the Civil Rights Act of 1964, as codified, 42 U.S.C. §§ 2000e to 2000e-17 (race, color, gender, religion, national origin).

(Note: In order to bring suit in federal district court under Title VII, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)



Age Discrimination in Employment Act of 1967, as codified, 29 U.S.C. §§ 621 to 634.

(Note: In order to bring suit in federal district court under the Age Discrimination in Employment Act, you must first file a charge with the Equal Employment Opportunity Commission.)

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☒ Americans with Disabilities Act of 1990, as codified, 42 U.S.C. §§ 12112 to 12117.

*(Note: In order to bring suit in federal district court under the Americans with Disabilities Act, you must first obtain a Notice of Right to Sue letter from the Equal Employment Opportunity Commission.)*

☐ Other federal law (specify the federal law):

☐ Relevant state law (specify, if known):

☐ Relevant city or county law (specify, if known):

### III. STATEMENT OF CLAIM

*Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.*

1. On or around July 2, 2020 I began working for the Respondent as a Customer Service Representative, Day Porter, and stocker. During the course of my employment, I performed my job duties in a satisfactory manner. On or around

On or before July 10 2020 employee reported unsafe work conditions. Employee informed store cashier Corrina to notify Primus of mold and mildew visible and leaks located near coffee and drinks area. Primus stated there is no mo

3. On July 22 2020 Employee was fired from location. On or before October 27, 2020 employee was on site. Employee observed coffee and drink counter under construction. Corrina fuel station cashier informed employee to leave the

A. The discriminatory conduct of which I complain in this action includes (check all that apply):

- ☐ Failure to hire me.
- ☒ Termination of my employment.
- ☐ Failure to promote me.
- ☒ Failure to accommodate my disability.
- ☒ Unequal terms and conditions of my employment.
- ☒ Retaliation.

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☐ Other acts (*specify*): \_\_\_\_\_

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

July 2, 2020, July 4, 2020, July 9, 2020, July 10, 2020, July 14, 2020, July 21, 2020, July 22, 2020, July 23, 2020, July 26, 2020, July 29, 2020, August 13, 2020, October 27, 2020, November 21, 2020, November 23, 2020

C. I believe that defendant(s) (*check one*):

☒ is/are still committing these acts against me.

☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (*check all that apply and explain*):

☒ race African American(Black)

☒ color Brown

☒ gender/sex Female

☐ religion \_\_\_\_\_

☐ national origin \_\_\_\_\_

☐ age (*year of birth*) \_\_\_\_\_ (*only when asserting a claim of age discrimination.*)

☒ disability or perceived disability (*specify disability*)  
perceived disability ILLITERATE

E. The facts of my case are as follows. Attach additional pages if needed.

Employee suffered ongoing harassment.

Employee reported harassment no action taken.

Employee reported unsafe work conditions. Employee was fired from location. Employer Retaliated against employee.

(*Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.*)

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**IV. EXHAUSTION OF FEDERAL ADMINISTRATIVE REMEDIES**

A. It is my best recollection that I filed a charge with the Equal Employment Opportunity Commission or my Equal Employment Opportunity counselor regarding the defendant's alleged discriminatory conduct on *(date)*

**ON OR ABOUT 09/2020**

B. The Equal Employment Opportunity Commission *(check one)*:

☐ has not issued a Notice of Right to Sue letter.

☒ issued a Notice of Right to Sue letter, which I received on *(date)*

**December 17, 2020**

*(Note: Attach a copy of the Notice of Right to Sue letter from the Equal Employment Opportunity Commission to this complaint.)*

C. Only litigants alleging age discrimination must answer this question.

Since filing my charge of age discrimination with the Equal Employment Opportunity Commission regarding the defendant's alleged discriminatory conduct *(check one)*:

☐ 60 days or more have elapsed.

☐ less than 60 days have elapsed.

**V. RELIEF**

*State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.*

**Remove public record Notice of Trespass**

**Remove public record Fired.**

Punitive damages, compensatory damages, rehire, transfer options.

*Pro Se 7 2016***VI. CERTIFICATION AND CLOSING**

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing:

03/15/2021

Signature of Plaintiff



Printed Name of Plaintiff

Nakeshia Terrell

Date of signing:

03/15/2021

Signature of Plaintiff



Printed Name of Plaintiff

Nakeshia Terrell

Date of signing:

03/15/2021

Signature of Plaintiff



Printed Name of Plaintiff

Nakeshia Terrell

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UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON

CASE NO. \_\_\_\_\_  
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DISCRIMINATION

Jury Trial: ☐ Yes ☐ No

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**A. Plaintiff(s)**

*Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.*

Name	_____
Street Address	_____
City and County	_____
State and Zip Code	_____
Telephone Number	_____



*Pro Se 7 2016*

## B. Defendant(s)

*Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.*

## Defendant No. 1

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

## Defendant No. 2

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

## Defendant No. 3

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

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Defendant No. 4

Name

Job or Title (*if known*)

Street Address

City and County

State and Zip Code

Telephone Number

C. Place of Employment

The address at which I sought employment or was employed by the defendant(s) is:

Name

Street Address

City and County

State and Zip Code

Telephone Number

**II. BASIS FOR JURISDICTION**

This action is brought for discrimination in employment pursuant to (*check all that apply*):

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- ☐ Failure to accommodate my disability.
- ☐ Unequal terms and conditions of my employment.
- ☐ Retaliation.

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☐ Other acts (*specify*): \_\_\_\_\_

B. It is my best recollection that the alleged discriminatory acts occurred on date(s)

C. I believe that defendant(s) (*check one*):

☐ is/are still committing these acts against me.

☐ is/are not still committing these acts against me.

D. Defendant(s) discriminated against me based on my (*check all that apply and explain*):

☐ race \_\_\_\_\_

☐ color \_\_\_\_\_

☐ gender/sex \_\_\_\_\_

☐ religion \_\_\_\_\_

☐ national origin \_\_\_\_\_

☐ age (*year of birth*) \_\_\_\_\_ (*only when asserting  
a claim of age  
discrimination.*)

☐ disability or perceived disability (*specify disability*) \_\_\_\_\_

E. The facts of my case are as follows. Attach additional pages if needed.

(*Note: As additional support for the facts of your claim, you may attach to this complaint a copy of your charge filed with the Equal Employment Opportunity Commission, or the charge filed with the relevant state or city human rights division.*)

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B. The Equal Employment Opportunity Commission *(check one)*:

- ☐ has not issued a Notice of Right to Sue letter.
- ☐ issued a Notice of Right to Sue letter, which I received on *(date)*

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Date of signing: \_\_\_\_\_

Signature of Plaintiff \_\_\_\_\_

Printed Name of Plaintiff \_\_\_\_\_

Date of signing: \_\_\_\_\_

Signature of Plaintiff \_\_\_\_\_

Printed Name of Plaintiff \_\_\_\_\_

Date of signing: \_\_\_\_\_

Signature of Plaintiff \_\_\_\_\_

Printed Name of Plaintiff \_\_\_\_\_